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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION – LOS ANGELES**

Frankel, et al.,

Plaintiffs,

v.

Regents of the University of  
California, et al.,

Defendants.

Case No. 2:24-CV-4702-MCS

**NOTICE OF MOTION AND  
INDIVIDUAL DEFENDANTS'  
MOTION FOR JUDGMENT ON  
THE PLEADINGS UNDER  
FEDERAL RULE 12(c) AND  
MOTION TO DISMISS UNDER  
FEDERAL RULE 12(h)(3)**

Judge: Hon. Mark C. Scarsi  
Courtroom: 7C  
Hearing: February 24, 2025, 9:00 AM

1 *[Counsel continued from previous page]*

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**NOTICE OF MOTION AND MOTION**

TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:

NOTICE IS HEREBY GIVEN THAT ON February 24, 2025 at 9:00 a.m. before the Honorable Mark C. Scarsi in Courtroom 7C at the United States Courthouse for the Central District of California located at 350 W. 1st Street, 7th Floor, Los Angeles, California 90012, the six administrators named as defendants in this action (the “Individual Defendants”) will and hereby do move the Court for judgment on the pleadings under Federal Rule of Civil Procedure 12(c) and to dismiss under Rule 12(h)(3).

This Motion is made following the conference of counsel pursuant to L.R. 7-3, which took place on November 19, 2024.

This Motion is based on this Notice of Motion and Motion, the accompanying Memorandum of Points and Authorities, the Declaration of Matthew Cowan and exhibits attached thereto, the files and records in this action, and other written and oral argument as may be allowed or presented to the Court.

By this Motion, the Individual Defendants seek an order (i) granting judgment on all claims for damages in favor of the Individual Defendants in their official capacities; (ii) granting judgment on all claims in favor of the Individual Defendants in their personal capacities; (iii) granting judgment on all claims in favor of Assistant Vice Chancellor Brazier; (iv) granting judgment on the Title VI claim in favor of the Individual Defendants in their personal and official capacities; and (v) at the very least, dismissing Plaintiffs’ demand for punitive damages.

Dated: November 26, 2024

Respectfully submitted,

By: /s/ Matthew R. Cowan

MATTHEW R. COWAN